
DOC Investigation Nos. A-570-196, C-570-197
USITC Investigation Nos. 701-TA-____ and 731-TA-____
Total Pages: 53
Investigation
AD/CVD Operations
Petitioner's Business Proprietary Information
REMOVED from Brackets () at Pages 2, 7, 11, 13-15,
19, Exhibit List, and at Exhibits I-2, I-7, I-9, and I-10 of
this Volume
PUBLIC VERSION

**BEFORE THE
INTERNATIONAL TRADE ADMINISTRATION OF THE
U.S. DEPARTMENT OF COMMERCE
AND THE
U.S. INTERNATIONAL TRADE COMMISSION**

**PETITIONS FOR THE IMPOSITION OF
ANTIDUMPING AND COUNTERVAILING DUTIES PURSUANT TO
SECTIONS 701 AND 731 OF THE TARIFF ACT OF 1930, AS AMENDED
VOLUME I:
COMMON ISSUES AND INJURY PETITION**

**IN THE MATTER OF:
SLAG POTS
FROM THE PEOPLE'S REPUBLIC OF CHINA**

**PETITIONER:
WHEMCO-STEEL CASTINGS, INC.**

**COUNSEL:
Daniel B. Pickard, Esq.
Milton I. Koch, CPA*
Grace E. Welborn, Esq.
Brandon J. Custard, Esq.**

**BUCHANAN INGERSOLL & ROONEY PC
1700 K Street, NW
Washington, DC 20006**

December 31, 2024

TABLE OF CONTENTS

I.	INTRODUCTION	1
II.	COMMON ISSUES.....	1
A.	Name and Address of the Petitioner (19 C.F.R. § 351.202(b)(1)).....	2
B.	Identity of the Industry on Whose Behalf the Petition Is Filed (19 C.F.R. § 207.11(b)(2)(ii); 19 C.F.R. § 351.202(b)(2))	2
C.	Information Relating to the Degree of Industry Support for the Petition (19 C.F.R. § 351.202(b)(3))	2
D.	Previous Requests for Import Relief for the Merchandise (19 C.F.R. § 351.202(b)(4)).....	2
E.	Scope of the Investigation and a Detailed Description of the Subject Merchandise (19 C.F.R. § 351.202(b)(5))	3
1.	Scope of Investigation.....	3
2.	Uses and Technical Characteristics.....	4
3.	Production Methodology	4
4.	Tariff Classification	5
F.	The Names of the Subject Countries and the Name of Any Intermediate Country Through Which the Merchandise Is Transshipped (19 C.F.R. § 351.202(b)(6)).....	5
G.	The Names and Addresses of Each Person Believed to Sell the Merchandise at Less Than Normal Value and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(i)(A)).....	6
H.	All Factual Information Related to the Calculation of Normal Value of the Foreign Like Product in Non-Market Economy Countries (19 C.F.R. § 351.202(b)(7)(i)(C)).....	6
I.	The Names and Addresses of Each Person Believed to Benefit from a Countervailable Subsidy Who Export the Subject Merchandise to the United States and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(ii)(A)).....	6
J.	The Alleged Countervailable Subsidy and Factual Information Relevant to the Alleged Countervailable Subsidy (19 C.F.R. § 351.202(b)(7)(ii)(B)).....	7

K.	The Volume and Value of the Merchandise Imported During the Most Recent Three-Year Period (19 C.F.R. § 351.202(b)(8))	7
L.	The Name and Address of Each Entity the Petitioner Believes Imports or Is Likely to Import the Merchandise (19 C.F.R. §§ 207.11(b)(2)(iii), 351.202(b)(9))	7
III.	DUMPED AND SUBSIDIZED SUBJECT IMPORTS ARE A CAUSE OF MATERIAL INJURY TO THE DOMESTIC SLAG POT INDUSTRY	8
A.	Introduction	8
B.	There is One Domestic Like Product Coextensive with the Scope	8
C.	There Is a Single Domestic Industry Consisting of All Domestic Producers	9
D.	Subject Imports Are Causing Material Injury to the Domestic Industry	9
1.	The Volume of Subject Imports Is Significant	10
a.	The Volume of Subject Imports Is Significant in Absolute Terms	10
b.	Subject Imports' Market Share was Significant During the Period	10
c.	Subject Imports Are Non-Negligible	11
2.	Subject Imports Have Had Negative Price Effects on the Domestic Like Product	12
a.	Subject Imports Are Underselling the Domestic Like Product	12
b.	Subject Imports Have Caused Price Suppression	13
3.	The Adverse Impact of Subject Imports on the Domestic Industry Is Significant	14
a.	High Levels of Subject Imports Resulted in Declining Financial Performance for the Domestic Industry	15
b.	Other Indicators Demonstrate Injury Caused by Subject Imports	15
c.	Subject Imports Have Caused U.S. Producers to Lose Sales and Revenues	16

IV.	SUBJECT IMPORTS THREATEN ADDITIONAL MATERIAL INJURY TO THE DOMESTIC INDUSTRY	16
A.	Subject Imports Have Maintained a Significant Presence Throughout the POI.....	17
B.	Subject Imports Have Had Demonstrable Price Effects	17
C.	China Encourages the Exportation of Subject Merchandise Through Countervailable Subsidies.....	17
D.	New and Unused Capacity Indicating a Likelihood of Substantially Increased Imports	18
E.	Inventories of Subject Merchandise Threaten the Domestic Industry with Additional Material Injury	18
F.	Facilities in the Subject Countries Currently Being Used to Make Other Products Could Be Used to Produce Slag Pots	19
G.	Subject Imports Are Hindering the Existing Development and Production Efforts of the Domestic Industry	19
H.	Conclusion	19
V.	CONCLUSION.....	20

I. INTRODUCTION

These petitions are submitted on behalf of WHEMCO-Steel Castings, Inc. (“Petitioner”), a domestic producer of slag pots.

Petitioner alleges that slag pots imported from the People’s Republic of China (“China”) are being or are likely to be sold at less than normal value (“LTNV”) within the meaning of section 731 of the Tariff Act, *codified and amended at* 19 U.S.C. § 1673 (hereinafter, “the Tariff Act”). Petitioner further alleges that slag pots imported from China are subsidized within the meaning of section 701 of the Tariff Act, *codified and amended at* 19 U.S.C. § 1671. These unfairly traded imports have materially injured the U.S. domestic industry and threaten to cause further material injury if relief is not granted. These Petitions contain information reasonably available to Petitioner in support of these allegations.

Separate volumes regarding the allegations of dumping by subject producers from China and countervailable subsidies provided to subject producers by China are being filed simultaneously at the U.S. Department of Commerce (“Commerce”) and the U.S. International Trade Commission (“the Commission”). Petitioner requests that antidumping and countervailing duties be imposed to offset the dumping and subsidy margins detailed in the antidumping and countervailing duty volumes, which contain allegations against China.

II. COMMON ISSUES

This section contains information required in antidumping and countervailing duty petitions by the regulations of Commerce¹ and the Commission.²

¹ 19 C.F.R. §§ 351.202(b)(1)-(1), (b)(12).

² *Id.* § 207.11.

A. Name and Address of the Petitioner (19 C.F.R. § 351.202(b)(1))

The Petitioner is WHEMCO-Steel Castings, Inc. Petitioner is a domestic interested party within the meaning of 19 U.S.C. § 1677(9)(C) and 19 C.F.R. § 351.102(b)(17). Petitioner's contact information is provided in **Exhibit I-1**.

B. Identity of the Industry on Whose Behalf the Petition Is Filed (19 C.F.R. § 207.11(b)(2)(ii); 19 C.F.R. § 351.202(b)(2))

These Petitions are filed on behalf of the U.S. industry that produces slag pots. To the best of Petitioner's knowledge, it represents the vast majority of U.S. production. According to the best information available to Petitioner, **Exhibit I-1** identifies all known U.S. producers of the merchandise under consideration in the United States.

C. Information Relating to the Degree of Industry Support for the Petition (19 C.F.R. § 351.202(b)(3))

Under the relevant statutory provisions, a petition is filed by or on behalf of the domestic industry if: (1) domestic producers or workers who support the petition account for at least 25% of the total production of the domestic like product, and (2) domestic producers or workers who support the petition account for more than 50% of the production of the domestic like product produced by that portion of the industry expressing support for or opposition to the petition.³ Petitioner meets both of these requirements.⁴ To the best of Petitioner's knowledge there was only one other producer of slag pots in 2023, Centre Foundry. This company is no longer in business.

D. Previous Requests for Import Relief for the Merchandise (19 C.F.R. § 351.202(b)(4))

Petitioner has not taken any action under the U.S. antidumping or countervailing duty laws in relation to slag pots imported from China. Petitioner has also not filed for import relief pursuant

³ 19 U.S.C. §§ 1671a(c)(4)(A) (countervailing duty petitions), 1673a(c)(4)(A) (antidumping petitions).

⁴ See **Exhibit I-2**, Declaration of[].

to Section 337 of the Act, 19 U.S.C. § 1337, or Sections 201 or 301 of the Trade Act of 1974, 19 U.S.C. §§ 3351 or 2411, or Section 232 of the Trade Expansion Act of 1962, 19 U.S.C. § 1862, with respect to slag pots. Further, Petitioner is unaware of such relief being requested by other parties. Petitioner notes that slag pots are subject to Section 301 duties.⁵

E. Scope of the Investigation and a Detailed Description of the Subject Merchandise (19 C.F.R. § 351.202(b)(5))

1. Scope of Investigation

This investigation pertains to slag pots. The physical characteristics of the covered products, which define the scope, are as follows:

The merchandise covered by the investigation are slag pots with a nominal capacity of 65 cubic feet to 1200 cubic feet regardless of shape, form, or finish.

Slag pots are load bearing devices typically formed as a curved shell designed to collect molten or solid slag generated during metallurgical or chemical processes. Slag pots are metallurgical goods typically produced either using a casting process or a fabrication process and may include a ceramic refractory coating, heat treatment or various finishes in order to handle high temperature slag. Slag pots are typically designed as lifting equipment and may include attachments to enable the transport of slag pots. Attachments may include 1) a connected stand 2) pivotal mounting hooks or brackets and 3) other attachments. The merchandise covered by this investigation includes all attachments of a fully assembled slag pot, regardless of whether shipped assembled or unassembled.

Subject slag pots are included within the scope whether finished or unfinished, whether imported individually or with other subject or non-subject parts, whether assembled or unassembled, or if joined with non-subject merchandise. Finishing includes, but is not limited to, arc washing, welding, grinding, shot blasting, heat treatment, machining, and assembly of various parts.

The country of origin for subject slag pots whether fully assembled, unfinished or finished, is the country where the subject slag pot was cast or forged. Subject merchandise includes slag pots that have been further processed or further assembled. Further processing includes, but is not limited to, arc washing, welding, grinding, shot blasting, heat treatment, painting, coating, priming, machining, and

⁵ Notice of Modification of Section 301 Action: China's Acts, Policies, and Practices Related to Technology Transfer, Intellectual Property, and Innovation, 83 Fed. Reg. 47,974, 47,983 (Office of the U.S. Trade Rep. Sept. 21, 2018).

assembly of various parts. The inclusion, attachment, joining, or assembly of non-subject parts with subject merchandise either in the country of manufacture of the in-scope product or in a third country does not remove the subject slag pots from the scope.

Slag pots subject to the investigation are specified within the Harmonized Tariff Schedule of the United States (HTSUS) under subheading 7309.00.0090. The HTSUS subheading is provided for convenience and customs purposes only. The written description of the scope of the investigations is dispositive.

2. Uses and Technical Characteristics

Slag pots are large bowl-shaped containers used to collect high-temperature molten slag from the production of certain liquid metals, such as steel. Slag pots can be designed for handling refractory oxide waste generated by metal melting operations. In steel making facilities, the products capture slag. These high temperature slag products cool in contact with the slag pot vessel wall to form a glassy layer that insulates against further heat transfer until the molten slag can be transported to a remote disposal site. The slag pots must withstand elevated temperatures due to prolonged exposure to hot molten slag.

3. Production Methodology

Slag pots are typically made through a multi-step process that includes metal melting and casting, processing and machining, and finishing.

Slag pots typically are produced utilizing carbon and alloy steel inputs, using a standard foundry steelmaking process. A combination of steel, carbon quality ferrous scrap, alloy quality ferrous scrap, or ferrous iron units are melted in a furnace that typically utilizes graphite electrodes that heat the furnace contents to a temperature of 2,800 degrees Fahrenheit or higher. During this process, certain alloying agents are added to ensure proper chemistry levels which are required to meet product specifications for strength and formability. The molten metal is then poured into a foundry mold, typically in the form of sand that has been compacted to produce a cavity of the rough shape of the casting. Once the casting has been poured into the mold and has cooled into a

solid, the sand is removed and blasted away, yielding a cast shape. This shape is freed of excess cast steel (known as gates and risers) that is present in the mold but is not part of the desired shape and is then prepared for machining into a finished slag pot component.

The cast steel shape is converted to a finished unit of slag pot through finishing operations. Machine tools, drills, and saws grind and reduce the shape to the correct dimensions. The product may also be subjected to additional finishing operations, such as shot blasting and sanding. Further, slag pots are subject to additional heat treatment processes. Additionally, depending on the good being produced, certain attachments or components may be further welded or physically mated into or onto the casting as dictated by the form of the casting.

Slag pots can be tested to ensure that they meet the requirements of the customer's specifications. Each approved slag pot is typically marked with a product code and product identifier to ensure traceability to the producer and to the producer's customers. Finished slag pot goods are then frequently shipped on an oversized truck to the customers facility.

4. Tariff Classification

Slag pots are currently classified under HTSUS subheading 7309.00.0090. Although the HTSUS subheadings are provided for convenience and customs purposes, the written description of the merchandise under investigation is dispositive. Excerpts from the current HTSUS are attached as **Exhibit I-3**. The tariff numbers are provided for the convenience of the U.S. Government and do not define the scope of the Petitions.

F. The Names of the Subject Countries and the Name of Any Intermediate Country Through Which the Merchandise Is Transshipped (19 C.F.R. § 351.202(b)(6))

The slag pots subject to these petitions are manufactured in and exported to the United States from China. At this time, Petitioner is unaware of any intermediate country through which the merchandise is transshipped.

G. The Names and Addresses of Each Person Believed to Sell the Merchandise at Less Than Normal Value and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(i)(A))

The names and addresses of the entities believed by Petitioner to be producing and exporting the slag pots subject to these Petitions are provided in **Exhibit I-4**. In compiling this exhibit, Petitioner relied upon information from foreign producer websites, internet research, market intelligence information, and Petitioner's industry knowledge.

H. All Factual Information Related to the Calculation of Normal Value of the Foreign Like Product in Non-Market Economy Countries (19 C.F.R. § 351.202(b)(7)(i)(C))

China is treated as a non-market economy for antidumping purposes. Volume II of these Petitions contains the information necessary to substantiate less than normal value allegations and factual information relevant to China.

I. The Names and Addresses of Each Person Believed to Benefit from a Countervailable Subsidy Who Export the Subject Merchandise to the United States and the Proportion of Total Exports to the United States (19 C.F.R. § 351.202(b)(7)(ii)(A))

The names and addresses of the entities believed by Petitioner to be benefitting from countervailable subsidies and who have exported slag pots subject to these Petitions are provided in **Exhibit I-4**. Petitioner attempted to identify as many foreign sources of slag pots as possible through market intelligence information, as well as open-source research. Information reasonably available to Petitioner does not allow it to identify the proportion of total exports to the United States accounted for during the most recent 12-month period by the producers listed in this exhibit. Petitioner believes, however, that the companies listed in **Exhibit I-4** account for a majority of subject exports.

J. The Alleged Countervailable Subsidy and Factual Information Relevant to the Alleged Countervailable Subsidy (19 C.F.R. § 351.202(b)(7)(ii)(B))

Volume III of these Petitions contains information concerning the alleged countervailable subsidies as well as factual information relevant to the alleged countervailable subsidies, the law, regulations, and the decrees under which the subsidies were bestowed, and the manners in which the subsidies were paid.

K. The Volume and Value of the Merchandise Imported During the Most Recent Three-Year Period (19 C.F.R. § 351.202(b)(8))

Data pertaining to the volume and value of subject imports is provided in **Exhibit I-5**. These data demonstrate significant imports in both volume and value of subject imports over the period of investigation (“POI”). Subject import volumes remained significant throughout the first, second, and third quarters of 2024. These are the best data available to Petitioner. Petitioner reasonably believes that the official import data are a broad basket category that may overstate the extent of subject imports by volume. While the import statistics are collected on a per unit basis, Petitioner believes it would be appropriate to collect import data on a per pound basis.

L. The Name and Address of Each Entity the Petitioner Believes Imports or Is Likely to Import the Merchandise (19 C.F.R. §§ 207.11(b)(2)(iii), 351.202(b)(9))

The names and addresses of importers of slag pots that are known to Petitioner at this time are listed in **Exhibit I-6**. Petitioner compiled this list based on [*source*] bill of lading data and additional open source research, however, there may be a number of importers of slag pots from China that are unknown to Petitioner at this time. Petitioner respectfully requests that Commerce and the Commission obtain this information from U.S. Customs and Border Protection (“CBP”), as Petitioner does not have access to this information.

III. DUMPED AND SUBSIDIZED SUBJECT IMPORTS ARE A CAUSE OF MATERIAL INJURY TO THE DOMESTIC SLAG POT INDUSTRY

A. Introduction

Imports of slag pots from China have caused material injury to the domestic industry. Unfairly traded subject imports have significant volumes and negative price effects in the U.S. market. The cumulative adverse effects of Chinese imports on the U.S. slag pot market and the domestic industry are significant.

B. There is One Domestic Like Product Coextensive with the Scope

In determining whether an industry in the United States is materially injured or threatened with material injury by reason of imports of the subject merchandise, the Commission first defines the domestic like product. The “domestic like product” is defined by the statute as “a product which is like, or in the absence of like, most similar in characteristics and uses with, the article subject to investigation....”⁶ In an investigation, the like product determination is a factual determination made on a case-by-case basis.⁷ The Commission generally considers the following six factors: (1) physical characteristics and uses; (2) interchangeability; (3) channels of distribution; (4) customer and producer perceptions of the products; (5) common manufacturing facilities, production process, and production employees; and, where appropriate, 6) price.⁸ In evaluating these factors, the Commission looks for a clear dividing line and disregards minor variations.⁹

The Commission should define a single like product coextensive with the scope in this investigation. In-scope slag pots share physical characteristics and uses. In addition, in-scope slag pots are generally interchangeable and are perceived by customers and end users to provide the

⁶ Section 771(10) of the Act (19 U.S.C. § 1677(10)).

⁷ See *NEC Corp. v. United States*, 36 F. Supp. 2d 380, 383 (CIT 1998).

⁸ See *Cleo, Inc. v. United States*, 501 F.3d 1291, 1295 (Fed. Cir. 2007).

⁹ *Id.*

same function for the end product. Slag pots are sold through the same or similar channels of distribution. Slag pots are also manufactured in common facilities, using similar production processes and the same production employees, and are typically sold at similar prices for similar products.

C. There Is a Single Domestic Industry Consisting of All Domestic Producers

Section 771(4)(A) of the Act defines the relevant domestic industry as the “producers as a whole of a domestic like product, or those producers whose collective output of a domestic like product constitutes a major proportion of the total domestic production of the product.”¹⁰ For purposes of these Petitions, Petitioner alleges there is a single domestic industry consisting of WHEMCO-Steel Castings, Inc.

D. Subject Imports Are Causing Material Injury to the Domestic Industry

In determining whether a domestic industry is experiencing present material injury caused by unfairly traded imports, the Commission considers:

- (1) The volume of imports of the subject merchandise;
- (2) The effect of imports of the merchandise on prices in the United States for domestic like products; and
- (3) The impact of imports of such merchandise on domestic producers of domestic like products.¹¹

An analysis of these factors shows that the domestic slag pot industry is suffering material injury by reasons of subject imports.

¹⁰ 19 U.S.C. § 1677(4)(A).

¹¹ 19 U.S.C. § 1677(4)(B).

1. The Volume of Subject Imports Is Significant

In evaluating the volume of imports, the Commission must “consider whether the volume of imports of the merchandise, or any increase in that volume, either in absolute terms or relative to production or consumption in the United States, is significant.”¹² In these investigations, available data show that the volume of subject imports, both in absolute terms and relative to U.S. production, is significant within the meaning of the relevant statutory provision.

a. The Volume of Subject Imports Is Significant in Absolute Terms

The volume of subject imports is significant in absolute terms during the POI. The subject import data that is presented herein and is reasonably available to the Petitioner is drawn from the official import statistics. Petitioner believes that the questionnaires should collect data on a per pound basis, however, as the official import data is collected on a per unit basis, these petitions will provide the import data consistent with the official import statistics. Subject imports from China under the applicable HTSUS codes were 37,803 units in 2021, increased to 43,479 units in 2022, and increased further to 76,402 units in 2023.¹³ Subject imports were significant by volume in year-to-date (“YTD”) 2024, amounting to 80,050 units as compared to 51,948 units YTD in 2023, an increase of 54.1%.¹⁴ When measured by value, subject imports were \$41,526,566 in 2021, \$44,868,586 in 2022, and \$22,090,673 in 2023.¹⁵ Subject imports value increased from \$15,484,041 in YTD 2023 to \$19,595,405 YTD in 2024.¹⁶

b. Subject Imports’ Market Share was Significant During the Period

The volume of subject imports is also significant over the POI when assessed relative to U.S. consumption. Petitioner’s market share analysis, attached at **Exhibit I-7**, demonstrates the

¹² 19 U.S.C. § 1677(4)(C)(i).

¹³ Official U.S. Import Statistics, attached at **Exhibit I-5**.

¹⁴ *Id.*

¹⁵ *Id.*

¹⁶ *Id.*

	2021	2022	2023
U.S.	[]	[]	[]
China	37,803	43,479	76,402
Non-Subject	0	0	0
Chinese Market Share	[]	[]	[]

c. Subject Imports Are Non-Negligible

Commission will examine “the most recent 12-month period for which data are available that precedes the filing of the petition.”²² The most recent 12-month period for which data are available is October 2023 through September 2024. The table below utilizes the official import data for China during this period and based on available information, there were no other non-subject imports of slag pots.²³ Accordingly, subject imports are not negligible.

Subject Imports from October 2023 – September 2024²⁴		
	Quantity (units)	Percent of Total
China	116,195	100%
All Others	0	0%
Total	116,195	100%

2. Subject Imports Have Had Negative Price Effects on the Domestic Like Product

In evaluating the effect of subject imports on prices, the Commission must consider whether “there has been significant price underselling by the imported merchandise,” and whether the effect of imports “otherwise depresses prices to a significant degree or prevents price increases, which otherwise would have occurred, to a significant degree.”²⁵ In these investigations, both of the statutory factors indicate that the price effect of subject imports is significant.

a. Subject Imports Are Underselling the Domestic Like Product

Evidence reasonably available to Petitioner indicates that the significant volume of subject imports, as well as significant underselling by subject imports, have had negative price effects. Subject imports compete directly with the domestic like product, as they are of a quality comparable to the domestic like product. Because of their interchangeability, subject imports and the domestic

²² 19 U.S.C. §§ 1677(24)(A)(i).

²³ See Petitioner’s Declaration at **Exhibit I-2**.

²⁴ See Negligibility Calculation, attached as **Exhibit I-8**.

²⁵ 19 U.S.C. § 1677(7)(C)(ii).

like product compete directly on the basis of price, and subject import producers are using unfairly traded prices in their competition with domestic producers. As shown in the official import data, the average unit value decreased from \$1,098.5 in 2021 to \$1,031.96 in 2022 and decreased further to \$289.14 in 2023. Import prices also decreased from \$298.07 in YTD 2023 to \$244.79 in YTD 2024. In 2024, the U.S. average unit value was [] per slag pot.²⁶ Petitioner again states its recommendation that the Commission should collect information on both a per unit and a per pound basis in its questionnaires.

This information demonstrates the injurious effects subject imports are having on the domestic industry as a whole. Petitioner reasonably believes that underselling will be further evidenced in the data that the Commission collects on prices of particular products. Pursuant to 19 C.F.R. § 207.11(b)(iv), and for purposes of the preliminary investigation, Petitioner requests that pricing data be collected for the following products:

Product 1: 635 Ft³ Slag Pot

Product 2: 900 Ft³ Slag Pot

Product 3: 600 Ft³ Slag Pot

Petitioner notes that, as certain importers appear to be end users, it would be appropriate for the Commission to collect their acquisition costs for purpose of the pricing product analysis.

b. Subject Imports Have Caused Price Suppression

Given the evidence of pervasive underselling by the subject imports, it is not surprising that those imports have subsequently had price-suppressing effects on the domestic like product. During the POI, the domestic industry attempted to maintain price and as a result it lost market share to Chinese imports. By the end of the POI, Petitioner's COGS to net sales ratio for the

²⁶ See Official U.S. Import Statistics, attached at **Exhibit I-5**; WHEMCO Steel Castings Inc. Production and Financial Data, attached at **Exhibit I-9**.

domestic like product increased from [number] percent to [number] percent from the first nine months of 2023 to the first nine months of 2024, indicating that the domestic industry is unable to increase prices in order to cover its costs.²⁷

3. The Adverse Impact of Subject Imports on the Domestic Industry Is Significant

In examining the impact of subject imports on the domestic industry, the Commission is instructed to “evaluate all relevant economic factors which have a bearing on the state of the industry in the United States.”²⁸ These factors include, but are not limited to:

- (1) Actual and potential decline in output, sales, market share, profits, productivity, return on investments, and utilization of capacity,
- (2) Factors affecting domestic prices,
- (3) Actual and potential negative effects on cash flow, inventories, employment, wages, growth, ability to raise capital, and investment,
- (4) Actual and potential negative effects of the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product, and
- (5) The magnitude of the margin of dumping.²⁹

As noted above; in assessing the impact of unfairly traded imports, the relevant statute directs the Commission to “evaluate all relevant economic factors . . . within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”³⁰ Based on the information reasonably available to Petitioner, the evidence demonstrates that the domestic industry is suffering material injury by reason of subject imports.

²⁷ See WHEMCO Production and Financial Data, at **Exhibit I-9**.

²⁸ 19 U.S.C. § 1677(7)(C)(iii).

²⁹ *Id.*

³⁰ *Id.*

a. High Levels of Subject Imports Resulted in Declining Financial Performance for the Domestic Industry

As noted above, in assessing the impact of unfairly traded imports, the relevant statute directs the Commission to “evaluate all relevant economic factors...within the context of the business cycle and conditions of competition that are distinctive to the affected industry.”³¹ Thus, in considering the impact of subject imports, the Commission must compare how domestic producers actually performed in comparison to how they would have performed in the absence of unfairly traded imports. The available evidence establishes that the significant levels of subject imports caused the financial performance of the domestic industry to decline.³²

Petitioner’s financial data demonstrate the poor and deteriorating performance of the domestic industry as a result of competition with unfairly traded subject imports. Subject imports had a negative impact on the financial condition of the domestic industry, with the industry posting [*description of data*].³³ As these indicia demonstrate, the U.S. industry experienced poor financial performance during the POI by reason of subject imports.

b. Other Indicators Demonstrate Injury Caused by Subject Imports

As stated above, during the POI, subject imports entered the United States in significant volumes. As a result of this substantial volume of unfairly traded imports, the domestic industry’s market share would have been higher. The domestic industry’s net sales quantities decreased both in a comparison of 2021 to 2023, but also in the interim periods.

³¹ *Id.*

³² See WHEMCO Production and Financial Data, at **Exhibit I-9**.

³³ *Id.*

In addition, subject imports resulted in injury to the workers. In YTD 2024, the average number of production related workers, hours worked, and wages paid all decreased relative to the same period in 2023.³⁴

c. Subject Imports Have Caused U.S. Producers to Lose Sales and Revenues

In addition, Petitioner has identified lost sales and revenues as a direct result of competition with lower priced imports.³⁵ These lost sales and revenue establish that Chinese imports are directly competing with the domestic like product, and that unfairly low prices for subject imports have a direct negative effect on the U.S. industry's prices and sales.

IV. SUBJECT IMPORTS THREATEN ADDITIONAL MATERIAL INJURY TO THE DOMESTIC INDUSTRY

The above discussion establishes that the subject imports have caused material injury to the domestic industry. In addition, the evidence available to Petitioner demonstrates that the subject imports threaten the domestic industry with further material injury. In determining whether subject imports threaten a domestic industry with material injury, the Commission must consider a number of factors. These factors include:

- A significant rate of increase of the volume or market penetration of imports of the subject merchandise
- Price effects of the subject imports
- The nature of any countervailable subsidies
- Existing unused production capacity or potential increases in production capacity in the exporting country
- Inventories of the subject merchandise
- The potential for product shifting³⁶

³⁴ *Id.*

³⁵ See WHEMCO Lost Sales and Lost Revenues, attached at **Exhibit I-10**.

³⁶ 19 U.S.C. § 1677(7)(F)(i).

A. Subject Imports Have Maintained a Significant Presence Throughout the POI

As highlighted above, subject imports have maintained a significant presence in the United States throughout the POI. Moreover, the subject imports based on the official import data increased from 37,803 units in 2021 to 76,402 units in 2023 – an increase of 102.1% – thereby demonstrating the ability of subject imports to significantly increase in a short period.³⁷

B. Subject Imports Have Had Demonstrable Price Effects

The Act provides that, in determining whether the domestic industry is threatened with material injury, the Commission should consider “whether imports of the subject merchandise are entering at prices that are likely to have a significant depressing or suppressing effect on domestic prices and are likely to increase demand for further imports.”³⁸ As discussed above, during the POI, subject merchandise substantially undersold the domestically produced product, causing negative price effects. Additionally, the official import statistics demonstrate imports entering at consistently lower AUV’s. Imports have continued to enter the United States in large volumes and at prices well below those of domestically produced slag pots, it is likely that domestic producers’ prices will continue to be suppressed without relief. Thus, subject imports’ adverse price effects indicate that the domestic industry is further threatened with additional injury.

C. China Encourages the Exportation of Subject Merchandise Through Countervailable Subsidies

As part of its threat analysis, the Commission must consider “if a countervailable subsidy is involved” and, in particular, “whether the countervailable subsidy is a subsidy described in Article 3 or 6.1” of the WTO Agreement on Subsidies and Countervailing Measures.³⁹ Article 3 of the WTO Subsidies Agreement describes subsidies that are prohibited because they are contingent

³⁷ See Market Share Analysis, attached at **Exhibit I-7**.

³⁸ 19 U.S.C. § 1677(7)(F)(i)(IV).

³⁹ 19 U.S.C. § 1677(7)(F)(i)(I).

upon export performance or upon the use of domestic over imported goods.⁴⁰ As demonstrated in these Petitions, subject producers in China have received countervailable subsidies, including export subsidies and import substitution subsidies. Among the more significant of these are:

- Export subsidies;
- Government grants;
- Provision of land for less than adequate remuneration;
- Provision of electricity for less than adequate remuneration;
- Tax breaks; and
- Discounted loans.⁴¹

D. New and Unused Capacity Indicating a Likelihood of Substantially Increased Imports

The Act provides that, in making a threat determination, the Commission shall consider “any existing or unused production capacity or imminent, substantial increase in production capacity in the exporting country indicating the likelihood of substantially increased imports.” The Commission will also consider whether other export markets that could absorb excess production are available to the subject producers. In this case, the information regarding foreign producer capacity is not reasonably available to Petitioner.

E. Inventories of Subject Merchandise Threaten the Domestic Industry with Additional Material Injury

The Commission must also consider inventories of the subject merchandise as an indicator of the extent to which subject imports threaten additional material injury to the domestic industry.⁴² At this time, Petitioner does not have access to data regarding inventories of slag pots in China.

⁴⁰ *Agreement on Subsidies and Countervailing Measures* (Apr. 15, 1994), Marrakesh Agreement Establishing the World Trade Organization, Annex 1, 1867 U.N.T.S. 14 at Art. 3.

⁴¹ See Volume III of these Petitions.

⁴² 19 U.S.C. § 1677(7)(F)(i)(V).

F. Facilities in the Subject Countries Currently Being Used to Make Other Products Could Be Used to Produce Slag Pots

In weighing the threat to the domestic industry, the Commission must consider “the potential for product-shifting if production facilities in the foreign country, which can be used to produce the subject merchandise, are currently being used to produce other products.”⁴³ At this time, information regarding product-shifting is not reasonably available to Petitioner.

G. Subject Imports Are Hindering the Existing Development and Production Efforts of the Domestic Industry

The Act further provides that, in assessing the threat to the domestic industry from subject imports, the Commission must consider “the actual and potential negative effects on the existing development and production efforts of the domestic industry, including efforts to develop a derivative or more advanced version of the domestic like product.”⁴⁴ As discussed above with respect to present material injury, the significant presence of subject imports caused the domestic industry to operate at a [*description of data*] the POI. Continuing harm of this type will make it difficult, if not impossible, for domestic producers to adequately fund their development and production efforts. Accordingly, this statutory factor also indicates that the domestic industry is threatened with additional material injury by subject imports.

H. Conclusion

All of the criteria for threat of material injury are present in this case. Significant volumes of unfairly traded subject imports have left the domestic industry in an extremely vulnerable condition. These large volumes of subject imports have had negative price effects. In the absence of relief, the subject imports will prevent the domestic industry from taking the steps needed to

⁴³ 19 U.S.C. § 1677(7)(F)(i)(VI).

⁴⁴ 19 U.S.C. § 1677(7)(F)(i)(VIII). It should be noted that *id.* § 1677(7)(F)(i)(VII) relates to investigations that involve imports of raw agricultural products, which are not relevant to these investigations.

remain competitive. For all of these reasons, the Commission should determine that subject imports threaten the domestic slag pot industry with material injury.

V. CONCLUSION

All statutory factors support a finding that subject imports of slag pots from China are a cause of material injury to the domestic industry. Moreover, the domestic industry is threatened with additional material injury from subject imports. Accordingly, Petitioner requests that Commerce and the Commission promptly grant the relief requested.

Slag Pots From The People's Republic of China– Volume I Petition

Exhibit Number	Exhibit Title	BPI/Public
I-1	Petitioner's Contact Information	Public
I-2	Declaration of [<i>individual</i>]	BPI
I-3	Excerpts of HTSUS	Public
I-4	Foreign Producer List	Public
I-5	Official U.S. Import Statistics	Public
I-6	Imports of Slag Pots	Public
I-7	Market Share Analysis	BPI
I-8	Negligibility Calculation	Public
I-9	Petitioner's Production and Financial Data	BPI
I-10	Petitioner Lost Sales and Lost Revenues Data	BPI

EXHIBIT I-1

List of Domestic Slag Pots Producers

1. WHEMCO -Steel Castings, Inc.
5 Hot Metal Street, Suite 300
Pittsburgh, PA 15203-2351

Point of contact:

Thomas Kane

Vice President, Sales & Technical Service

Office phone: 412-390-2721

Mobile phone: 412-576-8979

e-mail: tkane@whemco.com

EXHIBIT I-2

DECLARATION

[*individual*] declares and states that:

1. I am currently the [*position within company*]. I have been in this position since [*number of years and description of role within company*]. My responsibilities include, among other things, overseeing [*description of responsibilities*]. In this role, and based on my professional experience, I am familiar with the U.S. slag pot industry and producers of slag pots in China and the United States.
2. I estimate that [*company*] produced [*number of production*] of slag pots in 2023. Accordingly, this estimate represents the [*description of domestic production*] for 2023 of slag pots.
3. There were [*description of domestic production by certain company names*].
4. To the best of my knowledge, I am not aware of any other U.S. producers of slag pots. To the extent that there are any other domestic producers of slag pots, that producer would likely represent less than 1% of U.S. slag pot production.
5. As the [*position within company*], I routinely monitor the market for slag pots and the volume and prices at which competing merchandise, including imported merchandise, is sold in the United States. To the best of my knowledge, all slag pots imported during the past three years came from China.
6. The text surrounded by square brackets in this declaration contains business proprietary information, the release of which would cause serious commercial harm to [*company name*].
7. I declare, under penalty of perjury, under the laws of the United States, that to the best of my knowledge, the foregoing is true and correct.

Executed December ¹⁹__, 2024 in [*location*]

[*signature*]
[*name*]

EXHIBIT I-3

Harmonized Tariff Schedule of the United States Revision 10 (2024)

Barcode: 4690266084559186 UNY Investigation - Annotated for Statistical Reporting Purposes

XV
73-25

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
7308		Structures (excluding prefabricated buildings of heading 9406) and parts of structures (for example, bridges and bridge sections, lock gates, towers, lattice masts, roofs, roofing frameworks, doors and windows and their frames and thresholds for doors, shutters, balustrades, pillars and columns) of iron or steel; plates, rods, angles, shapes, sections, tubes and the like, prepared for use in structures, of iron or steel:				
7308.10.00	00	Bridges and bridge sections.....	kg.....	Free ^{3/}		45%
7308.20.00		Towers and lattice masts.....		Free ^{3/}		45%
	20	Tubular, whether or not tapered, and sectional components thereof.....	kg			
	90	Other.....	kg			
7308.30		Doors, windows and their frames and thresholds for doors:				
7308.30.10	00	Of stainless steel.....	kg.....	Free ^{3/}		35%
7308.30.50		Other.....		Free ^{3/}		25%
	15	Windows and their frames.....	kg			
	25	Thresholds for doors.....	kg			
	50	Other.....	kg			
7308.40.00	00	Equipment for scaffolding, shuttering, propping or pit-propping.....	kg.....	Free ^{3/}		45%
7308.90		Other:				
		Columns, pillars, posts, beams, girders and similar structural units:				
7308.90.30	00	Not in part of alloy steel.....	kg.....	Free ^{3/}		20% ^{4/}
7308.90.60	00	Other.....	kg.....	Free ^{3/}		30% ^{4/}
		Other:				
7308.90.70	00	Steel grating.....	kg.....	Free ^{3/}		45%
7308.90.95		Other.....		Free ^{3/}		45%
	30	Sheet-metal roofing, siding, flooring and roof drainage equipment.....	kg			
		Other:				
	60	Architectural and ornamental work.....	kg			
	90	Other.....	kg			
7309.00.00		Reservoirs, tanks, vats and similar containers for any material (other than compressed or liquefied gas), of iron or steel, of a capacity exceeding 300 liters, whether or not lined or heat insulated, but not fitted with mechanical or thermal equipment.....		Free ^{3/}		45%
	30	Tanks.....	No. kg			
	90	Other.....	No. kg			

Harmonized Tariff Schedule of the United States Revision 10 (2024)

Barcode: 46902660824559186 INV Investigation -

Annotated for Statistical Reporting Purposes

XV
73-26

Heading/ Subheading	Stat. Suf- fix	Article Description	Unit of Quantity	Rates of Duty		
				1		2
				General	Special	
7310		Tanks, casks, drums, cans, boxes and similar containers, for any material (other than compressed or liquefied gas), of iron or steel, of a capacity not exceeding 300 liters, whether or not lined or heat insulated, but not fitted with mechanical or thermal equipment:				
7310.10.00		Of a capacity of 50 liters or more.....		Free ^{3/}		25% ^{4/}
	05	Refillable stainless steel kegs, whether or not pressurized, of a kind described in statistical note 1 to this chapter.....	No.			
	15	Empty steel drums and barrels.....	No. kg			
	90	Other.....	kg			
7310.21.00		Of a capacity of less than 50 liters: Cans which are to be closed by soldering or crimping.....		Free ^{3/}		25%
	25	Containers, of circular cross section, of a volume capacity between 11.4 liters and 26.6 liters, of a kind used for the conveyance of goods.....	No.			
	50	Other.....	No.			
7310.29.00		Other.....		Free ^{3/}		25% ^{4/}
		Containers, of circular cross section, of a volume capacity between 11.4 liters and 26.6 liters, of a kind used for the conveyance of goods:				
	20	Refillable stainless steel kegs, whether or not pressurized, of a kind described in statistical note 1 to this chapter.....	No.			
	30	Other.....	No.			
	55	Other: Refillable stainless steel kegs, whether or not pressurized, of a kind described in statistical note 1 to this chapter.....	No.			
	65	Other.....	No.			
7311.00.00		Containers for compressed or liquefied gas, of iron or steel.....		Free ^{3/}		25% ^{4/}
		Certified prior to exportation to have been made in accordance with the safety requirements of sections 178.36 through 178.68 of title 49 CFR or under a specific exemption to those requirements:				
	30	Seamless steel containers not overwrapped, marked DOT 3A, 3AX, 3AA, 3AAX, 3B, 3E, 3HT, 3T or DOT-E followed by a specific exemption number.....	No. kg			
	60	Other.....	No. kg			
	90	Other.....	No. kg			

EXHIBIT I-4

List of Foreign Producers

Company Name	Company Address	Telephone	Email
Changzhou Jinyuan Machinery Equipment Ltd. Co.	1 Anning Road, Xinbei District, Changzhou, Jiangsu, 213161 China	+4 008 288 590	jycailingjing@wellegroup.com
Liaoning Mineral and Metallurgy Group Co. Ltd.	Building 8, Yintian South Park, Yida Chuntian, Ganjingzi District, Dalian 116000, China	+86 411 841 74804	lmme-business@lmmgroup.com.cn
Shantou Huaxing Metallurgical Equipment Co. Ltd.	Rongsheng Science Park, Daxue Rd, Shantou City, Guangdong Province, 515063, China	+86 754 825 26192	market@hcool.com.cn
Shaoguan Germany China Metal Group, Ltd.	1-202 Rongshan Feicuiwan, Baiwang Road, Wujiang District, Shaoguan 512000, Guangdong, China	+86 216 380 6036	sgss@baosteel.com
UMECC Beijing Equipment Co. Ltd.	Jin Ji Ye Building, No. 5 No. 2 Shengguzong Rd. Beijing 100029, China	+86 108 426 343	mail@umecc.com
Dehua Protech Innovation Co., Ltd.	1502 no 5-2 Tianci Ave., Hunnan District Shenyang 110005, China	+86 216 380 6036	<i>Not reasonably available.</i>
MCC Baosteel Technology Services Co., Ltd.	NO.601 Pangu Road Baoshan, Shanghai, 200999, China	+86 215 619 1271	CSR@mcc.com.cn
Shenyang Minmetal Import & Export Co., Ltd.	Int. Trading Center, B#1502, 5# Tianci Ave., Hunnan District, Shenyang, Liaoning, 110016, China	+86 755 895 17585	zc@minmetals.com.cn; minmetal@syshi.com.cn
Chaeng Great Wall Casting Co., Ltd.	Mengzhuang Town, Huixian City, Henan Province, 453600, China	+86 371 550 19878	casting@chaeng.co
Dawang Metals Co. Ltd.	Pusamiao Town, Donggang City, Dandong City, Liaoning China 118314	+ 86 130 519 82717	sales@dawangmetals.com

List of Foreign Producers

Company Name	Company Address	Telephone	Email
China Minmetals Corporation	Tower A, Minmetals Plaza, No. 3 North Chaoyang-men Avenue, Dongcheng District, Beijing, 100010 China	+86 106 016 9000	zc@minmetals.com.cn

EXHIBIT I-5

Exhibit I-5 - Official U.S. Import Statistics

Download Date	December 11, 2024, 3:50 PM
Step 1: Trade Flow and Classification System	
Trade Flow	Imports For Consumption
Classification System	HTS Items
Step 2: Data and Years	
Data To Report	First Unit of Quantity, Landed Duty-Paid Value, (Landed Duty-Paid Value)/(First Unit of Quantity)
Data Format	1
Years	2021, 2022, 2023, 2024
Timeframe Aggregation	Year-to-Date
Step 3: Countries	
Select Type	Select Individual Countries
Country List	China
Country Aggregation	Aggregate countries
Step 4: Commodities	
Select Type	Select Individual Commodities
Commodity List	730900
Commodity Aggregation Level	10
Commodity Aggregation	Aggregate Commodities
Description Display	NO
Step 5: Programs	
Select Type	Use All Programs
Import Program Aggregation	Aggregate CSC
Step 6: Rate Provision Codes	
Select Type	Use All Provision Codes
Provision Code Aggregation	Aggregate RPCODE
Step 7: Districts	
Select Type	Use All Districts
District Aggregation	Aggregate District
Step 8: Report Layout	
Column Order	UNITS
Column Sort Order	
Percent Change Column	Unchecked
Show All	Checked
Enable Subtotals	Unchecked

Imports For Consumption Annual + Year-To-Date Data from Jan - Oct								
Data Row Count		1						
	Data Type	TOTAL	Quantity Description	Year 2021	Year 2022	Year 2023	2023 YTD (Jan - Oct)	2024 YTD (Jan - Oct)
First Unit of Quantity		TOTAL	number	159,671	317,900	358,199	294,120	356,185
Total:				159,671	317,900	358,199	294,120	356,185

Imports For Consumption Annual + Year-To-Date Data from Jan - Oct								
Data Row Count		1						
	Data Type	TOTAL	Quantity Description	Year 2021	Year 2022	Year 2023	2023 YTD (Jan - Oct)	2024 YTD (Jan - Oct)
Landed Duty Paid Value		TOTAL	number	64,215,486	70,035,486	48,097,879	41,514,048	47,137,316
Total:				64,215,486	70,035,486	48,097,879	41,514,048	47,137,316

Imports For Consumption Annual + Year-To-Date Data from Jan - Oct								
Data Row Count		1						
	Data Type	TOTAL	Quantity Description	Year 2021	Year 2022	Year 2023	2023 YTD (Jan - Oct)	2024 YTD (Jan - Oct)
(Landed Duty Paid Value)/(First Unit of Quantity)		TOTAL	number	402	220	134	141	132

EXHIBIT I-6

List of Slag Pots Importers

U.S. Importer	Address	Telephone	Email
Alliance Green Services US Inc.	1209 Orange St. Wilmington, New Castle, 19801		info@agseus.com
Ames Copper Group LLC	125 Old Boiling Springs Rd. Shelby, NC 28152	(980) 552-3530	admin@amescoppergroup.com
Freeport McMoran Inc	333 N. Central Ave. Phoenix, AZ 85004	(602) 366-8100	fcx_communications@fmi.com
Edw. C. Levy Co.	9300 Dix Ave. Dearborn, MI 48120	(313) 429-2200	info@edwclevy.com
Kennecott Utah Copper LLC	4700 W Daybreak Pkwy, South Jordan, UT 84009	(801) 204-2000	rtkcomments@riotinto.com
MECC USA LLC	3143 Western Row Rd. Maineville, OH 45039	(513) 336-9744	mail@umecc.com
TMS International, LLC	1155 Business Center Dr #200 Horsham, PA 19044	(215) 956-5500	jleonard@tmsinternational.com
RAMM Metals	5609 Hammock Isles Drive, Naples, FL 34119	(239) 430-7474	mp@rammglobal.com

EXHIBIT I-7

Barcode:4690266-02 A-570-196 INV - Investigation -

Market Share Analysis (in Units)

Quantity (Gross)	Calendar Year			% Change
Country	2021	2022	2023	
Imports from China	37,803	43,479	76,402	102.11%
Non-Subject Imports	0	0	0	0
Domestic Shipments	[69.35]	[]	[]	[]
Total Market	[]	[]	[]	[]
Market Share	2021	2022	2023	Market Share Shift
Imports from China	[]	[]	[]	[]
Non-Subject Imports	0%	0%	0%	0%
Domestic Shipments	[]	[]	[0.0686%]	[]
Total Market	100%	100%	100%	

EXHIBIT I-8

Imports For Consumption | Monthly data for 2023

Data Row Count							
	Data Type	Country	Quantity Description	SEP	OCT	NOV	DEC
First Unit of Quantity		China	number	2,597	13,239	8,119	3,096
Total:				2,597	13,239	8,119	3,096

Imports For Consumption | Monthly data for 2024

Data Row Count													
	Data Type	Country	Quantity Description	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT
First Unit of Quantity		China	number	7,118	4,119	4,598	9,154	8,877	10,338	9,982	15,896	9,968	9,094
Total:				7,118	4,119	4,598	9,154	8,877	10,338	9,982	15,896	9,968	9,094

All other imports	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
Chinese imports	7,118	4,119	4,598	9,154	8,877	10,338	9,982	15,896	9,968	9,094	2,597	13,239	8,119	3,096	116,195
Negligibility calculation:	100.00%														

EXHIBIT I-9

Domestic Slag Pot Production

Quantity (in units) and value (dollars)					
Item	Calendar Year				
	2021	2022	2023	YTD 2023	YTD 2024
			111.55		
				47.53	
					9.80
	\$1,245,545.00				

Operations on Slag Pots

Item	Quantity (in pounds) and value (in dollars)				
	Calendar Year			January-September	
	2021	2022	2023	2023	2024
	6,497,047.20				
		15,259,532.00			
		3,187,175.90			645,299.85
				8,969,262.72	
			3,515,282.91		
	9,634.38				

Employment Data

Item				Q1-Q3	
	2021	2022	2023	2023	2024
			66.93		
	147.84				

EXHIBIT I-10

Lost Sales and Lost Revenues												
Date	Domestic Producer	Purchaser	First Name	Last Name	Email	Phone	Zip Code	Allegation Type	Subject Country	Product	Volume	Estimated Value
												139,680